IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

DALLEN AND PEGGY WENDT, husband and wife,)
Plaintiffs,)
) Case No. 08 CV 3612
v.)
)
) Judge Castillo
) Magistrate Judge Cole
HANDLER, THAYER & DUGGAN, LLC, et al,)
)
Defendants.)

<u>DEFENDANTS' UNOPPOSED MOTION FOR AN EXTENSION OF TIME</u> TO ANASWER OR OTHERWISE PLEAD TO PLAINTIFFS' COMPLAINT

Defendants, Stephen P. Donaldson ("Donaldson"), Foster & Dunhill Consulting, Inc. ("F&D Consulting"), and Foster & Dunhill Planning Services, LLC ("F&D Planning"), (collectively, "Defendants"), by their undersigned counsel, and pursuant to Federal Rule 6(b), move this Court to enter an Order extending the time for the filing of their pleading responsive to Plaintiffs' Complaint until September 2, 2008. In support of their motion, Defendants state as follows:

- 1. Plaintiffs filed the instant action on June 24, 2008.
- 2. Defendants were served with summons on July 3, 2008.
- 3. On or about July 15, 2008, Defendants retained Canel, Davis & King to represent them.
- 4. Defendants' counsel requires additional time to adequately investigate the Plaintiffs' claims set forth in the Complaint and thereafter prepare and file an appropriate responsive pleading to the Complaint.
 - 5. Defendants respectfully request an extension of time up to and including September

2, 2008, in which to answer or otherwise plead to the Complaint.

6. This motion is not being brought for purposes of delay.

7. Plaintiffs have no objection to this motion.

WHEREFORE, Defendants Stephen P. Donaldson, Foster & Dunhill Consulting, Inc., and Foster & Dunhill Planning Services, LLC, respectfully request that this Honorable Court enter an Order granting an extension of time up to and including September 2, 2008, in which to answer or otherwise plead to Plaintiffs' Complaint, and for such other and further relief as the Court deems just and proper.

Respectfully submitted,

By: <u>/s/ Peter M. King</u>
One of the attorneys for Defendants

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